



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

May 19, 2022

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MEMO ENDORSED

VIA ECF

Hon. Valerie E. Caproni
United States District Judge
United States District Court
40 Foley Square
New York, New York 10007

Re: *Nada Zoubair v. Garland, et al.*, No. 22 Civ. 180 (VEC)

Dear Judge Caproni:

This Office represents the government in this action in which the plaintiff seeks an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate an Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of the government, I write respectfully to request a forty-five-day extension of the time to respond to the complaint (*i.e.*, from June 7, 2022, to July 22, 2022). In addition, I respectfully request that the initial pretrial conference presently scheduled for May 27, 2022, be rescheduled for a date during the week of August 1, 2022, or thereafter (with a corresponding extension of time for the preconference submission). *See* ECF No. 16.¹

I respectfully request this extension because USCIS is transferring the file to the appropriate location for review and needs additional time to determine next steps, which may include a Request for Evidence, Notice of Intent to Deny, or other adjudicatory action. This is the government’s first request for an extension of the deadline to respond to the complaint and an adjournment of the pretrial conference.² Plaintiff consents to both requests.

¹ Counsel for the government will not be available from August 5, 2022, through August 12, 2022.

² The Court cancelled a previous conference scheduled for March 25, 2022, because the government had not been served. *See* ECF No. 3.

I thank the Court for its consideration of this request.

Respectfully submitted,

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cc: Counsel of record (via ECF)

Application GRANTED. The Government's deadline to respond is **July 22, 2022**. The initial pretrial conference, originally scheduled for May 27, 2022, is hereby ADJOURNED to **Friday, August 26, 2022 at 11:00 a.m.** in Courtroom 443 of the Thurgood Marshall Courthouse, 40 Foley Square, New York, New York, 10007. The parties' joint submissions are due by no later than **August 18, 2022**. For the joint submission requirements, the parties should consult docket entry 2.

SO ORDERED.



Date: 5/17/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE